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 ERIK L. ANDERSON; FREEDOM MORTGAGE
 CORPORATION; XPANSE, LLC; ARCHWELL
 HOLDINGS, LLC; ARCHWELL SOLUTIONS
 LLC; ARCHWELL MANAGEMENT LLC;
 KEYSTONE B2B LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RAHUL MEWAWALLA, an individual,

Plaintiff,

vs.

STANLEY C. MIDDLEMAN, an individual;
 MICHAEL B. MIDDLEMAN, an individual;
 GREGORY E. MIDDLEMAN, an individual; ERIK
 L. ANDERSON, an individual; FREEDOM
 MORTGAGE CORPORATION; a New Jersey
 corporation; XPANSE, LLC, a Delaware limited
 liability company; ARCHWELL HOLDINGS LLC,
 a Florida limited liability company; ARCHWELL
 SOLUTIONS, a Florida limited liability company;
 ARCHWELL MANAGEMENT LLC, a Florida
 limited liability company; KEYSTONE B2B LLC, a
 Florida limited liability company; and DOES 1-50,
 inclusive

Defendants.

Case No. 3:21-cv-09700-EMC

**JOINT STIPULATION FOR ORDER TO
 CONTINUE INITIAL CASE
 MANAGEMENT CONFERENCE**

Judge: Edward M. Chen

Case Removed: December 16, 2021
 Trial Date: Not Set.

1 This stipulation is entered into by and between Plaintiff Rahul Mewawalla (“Plaintiff”) and
 2 Defendants Stanley C. Middleman, Michael B. Middleman, Gregory E. Middleman, Erik L.
 3 Anderson, Freedom Mortgage Corporation, Xpanse, LLC, Archwell Holdings LLC, Archwell
 4 Solutions LLC, Archwell Management LLC, and Keystone B2B LLC (collectively, “Defendants”),
 5 and made with reference to and in contemplation of the following facts and circumstances:

6 WHEREAS, on or about September 3, 2021, Plaintiff initiated this lawsuit by filing a
 7 Complaint against Defendants in the Superior Court of California for the County of Santa Clara;

8 WHEREAS, on November 16, 2021, Defendants were served with a copy of the Complaint
 9 and Summons through execution of Notice and Acknowledgement of Receipt forms;

10 WHEREAS, on December 16, 2021, Defendants filed their Notice of Removal, removing the
 11 case to the above-captioned Court (Dkt. No. 1);

12 WHEREAS, on December 23, 2021, Defendants filed their Motion to Dismiss Plaintiff’s
 13 Complaint pursuant to Federal Rules of Civil Procedure 12(b)(2) and (6), which was scheduled for
 14 hearing on February 3, 2022 (Dkt. No. 12);

15 WHEREAS, on December 23, 2021, the Court issued its Order setting the Initial Case
 16 Management Conference for April 12, 2022 at 1:30 p.m. via videoconference (Dkt. No. 11);

17 WHEREAS, on February 3, 2022, the Court conducted a remote hearing on Defendants’
 18 Motion to Dismiss Plaintiff’s Complaint;

19 WHEREAS, the Court took the matter of Defendants’ Motion to Dismiss Plaintiff’s
 20 Complaint under submission;

21 WHEREAS, the parties are to submit a Joint Case Management Statement no later than April
 22 5, 2022 based upon the April 12, 2022 Initial Case Management Conference date;

23 WHEREAS, the parties have conferred and agreed that the Court’s pending ruling on
 24 Defendants’ Motion to Dismiss Plaintiff’s Complaint, which is potentially dispositive of certain
 25 causes of action and parties, should first issue before the Initial Case Management Conference
 26 occurs, such that the parties are clear as to the legal and factual issues in this matter for further
 27 discovery;

WHEREAS, this is the first stipulation by the parties for a continuance of any matter in this action;

IT IS SO STIPULATED by and between Plaintiff and Defendants as follows:

1. The Initial Case Management Conference shall be continued from April 12, 2022 to **June 14, 2022**, or another date convenient for the Court, at 1:30 p.m. via videoconference;

2. All related deadlines, including the timing of the FRCP 26(f) conference, shall track the new date for the Initial Case Management Conference.

DATED: March 14, 2022

BLANK ROME LLP

By: /s/ Arash Beral

Arash Beral

Caroline P. Donelan

Craig N. Haring

Attorneys for Defendants

STANLEY C. MIDDLEMAN, ET AL.

DATED: March 14, 2022

KITCHIN LEGAL, APC

By: /s/ Patrick R. Kitchin

Patrick R. Kitchin

Attorneys for Plaintiff

RAHUL MEWAWALLA

I, Arash Beral, am the ECF user whose ID and password are being used to file this Stipulation and [Proposed] Order. In compliance with L.R. 5-1, I hereby attest that concurrence in the filing of the document has been obtained from each of the other signatories.

/s/ Arash Beral

Arash Beral